

1  
2  
3  
4  
5  
6                   UNITED STATES DISTRICT COURT  
7                   WESTERN DISTRICT OF WASHINGTON  
8                   AT SEATTLE

9                   ASHLEY COOK, individually and on behalf of all  
10                  others similarly situated,

11                  Plaintiffs,

12                  v.

13                  AMAZON SERVICES.COM, LLC,

14                  Defendant.

Case No. 2:25-CV-00050-JHC

STIPULATED MOTION TO EXTEND  
DEADLINE TO AMEND THE  
COMPLAINT AND SET BRIEFING  
SCHEDULE AND ORDER

15                   **STIPULATION**

16                  Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff Ashley Cook and Defendant Amazon  
17                  Services.com, LLC, (“Amazon”) (together, the “parties”) hereby jointly stipulate as follows:

18                  1. Plaintiff filed this action on January 8, 2025 (Dkt. #1).

19                  2. The Court issued a Summons on January 13, 2025 (Dkt. #2).

20                  3. Plaintiff served the Summons and Complaint on Amazon on January 14, 2025.<sup>1</sup>

21                  4. Defendant responded to the Complaint on February 25, 2025 and moved to dismiss  
(Dkt. # 13).

22  
23  
24  
25                  1 The Complaint was filed against “Amazon Services.Com, LLC.” That entity does not exist, but appears to be an  
26                  erroneous reference to Amazon.com Services, LLC. The Complaint was served upon the registered agent for the  
latter entity. Amazon reserves all rights as to the identity of the correct defendant.

1       5.     The parties agreed by stipulation that Plaintiff would have 28 days after the filing  
2 of such motion to file an opposition, and Defendant would have 14 days after the filing of  
3 Plaintiff's opposition to file a reply brief (Dkt. # 8).

4       6.     Plaintiff, upon considering the motion to dismiss, believes that an amendment could  
5 resolve some, if not all, of the pending items.

6       7.     Plaintiff's deadline to amend is March 18, 2025, *see* Fed. R. Civ. P. 15(a)(1)(B),  
7 but the opposition to the motion to dismiss is not due until March 25, 2025, *see* Dkt. # 9.

8       8.     The parties have conferred and agree to stipulate, and seek an order that, Plaintiff  
9 may amend her complaint by April 1, 2025. The parties further stipulate to extend the time in  
10 which to respond to the forthcoming amended complaint to May 1, 2025. In the event that  
11 Defendant files a motion under Rule 12 or other applicable provision, the parties also agree that  
12 Plaintiff shall have 28 days after the filing of such motion to file an opposition, and Defendant  
13 shall have until 14 days after the filing of Plaintiff's opposition to file a reply brief.

14       9.     No scheduling order has been entered in this case, so this motion would not affect  
15 any other scheduled dates in the proceeding.

16                   RESPECTFULLY SUBMITTED this 18th of March, 2025.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

1 By: s/ Michael C. Subit

2 Michael C. Subit, WSBA #29189  
3 **FRANK FREED SUBIT & THOMAS**  
4 705 Second Avenue, Suite 1200  
5 Seattle, WA 98104-1729  
6 Telephone: 206-682-6711  
7 Email: Msubit@frankfreed.com  
8 Attorneys for Plaintiff

9 Evan K. Richardson (*pro hac vice*)  
10 **HARMAN GREEN PC**  
11 824 Exposition Avenue, Suite 8  
12 Dallas, TX 75226  
13 Tel: 646-248-2288  
14 Email: Erichardson@theharmanfirm.com

15 Walker G. Harman, Jr. (*pro hac vice*)  
16 **HARMAN GREEN PC**  
17 824 Exposition Avenue, Suite 8  
18 Dallas, TX 75226  
19 Tel: 646-248-2288  
20 Email: Wharman@theharmanfirm.com

21 *Counsel for Plaintiff and the  
22 Proposed Putative Class*

23  
24  
25  
26 STIPULATION TO EXTEND DEADLINE TO AMEND  
COMPLAINT AND SET BRIEFING SCHEDULE AND  
ORDER – 3  
(CASE NO. 2:25-CV-00050)

1  
2 By: s/ Shannon McDermott  
3

4 Andrew E. Moriarty, Bar No. 28651  
5 Shannon McDermott, Bar No. 59455  
6 **Perkins Coie LLP**  
7 1201 Third Avenue, Suite 4900  
8 Seattle, Washington 98101-3099  
9 Telephone: +1.206.359.8000  
10 Facsimile: +1.206.359.9000  
11 AMoriarty@perkinscoie.com  
12 SMcDermott@perkinscoie.com

13 Lauren M. Blas (*pro hac vice*)  
14 **Gibson, Dunn & Crutcher LLP**  
15 333 South Grand Avenue  
16 Los Angeles, California 90071-3197  
17 Telephone: 213.229.7000  
18 Facsimile: 213.229.7520  
19 LBlas@gibsondunn.com

20 Jason C. Schwartz (*pro hac vice*)  
21 David A. Schnitzer (*pro hac vice*)  
22 **Gibson, Dunn & Crutcher LLP**  
23 1700 M Street NW  
24 Washington, D.C. 20036-4504  
25 Telephone: 202.955.8500  
26 Fax: 202.467.0539  
[jschwartz@gibsondunn.com](mailto:jschwartz@gibsondunn.com)  
[dschnitzer@gibsondunn.com](mailto:dschnitzer@gibsondunn.com)

27 *Attorneys for Defendant*

## ORDER

Based upon the foregoing Stipulation, **IT IS SO ORDERED.**

DATED this 19th day of March, 2025.

John H. Chan

John H. Chun  
United States District Judge

**STIPULATION TO EXTEND DEADLINE TO AMEND  
COMPLAINT AND SET BRIEFING SCHEDULE AND  
ORDER – 5**  
(CASE NO. 2:25-CV-00050)